

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Robert Griffith

Case: 2:24-mj-30479

Case No. Assigned To : Unassigned

Assign. Date : 11/7/2024

Description: CMP USA V. GRIFFITH (IJ)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 14, 2024 to November 6, 2024 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 2422(b)
18 U.S.C. § 2252A(a)(5)(B)

Attempted coercion and enticement of a minor
Possession of child pornography

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: November 7, 2024

City and state: Detroit, Michigan



Complainant's signature

Eli Bowers, Special Agent (FBI)

Printed name and title



Judge's signature

Hon. Kimberly G. Altman, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Eli Bowers, a Special Agent with the Federal Bureau of Investigation (FBI),
being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I have been employed as a Special Agent of the Federal Bureau of Investigation (FBI) since 2015 and am currently assigned to the FBI Detroit Division. Prior to being employed by the FBI, I was employed as a Park Ranger with the National Park Service for approximately six years, where my duties included the enforcement and investigation of federal crimes. While employed by the FBI, I have investigated numerous federal criminal violations related to child exploitation and child pornography. I have received training in investigating internet fraud, computer intrusions, and matters involving the online sexual exploitation of children. I have gained experience through training at the FBI Academy, post Academy training, and everyday work related to conducting these types of investigations.

2. I have received training in the area of child pornography and child exploitation and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media, including computer media. Moreover, I am a federal law enforcement

officer who is engaged in enforcing criminal laws, including 18 U.S.C. § 2252A. I am authorized by law to request an arrest warrant.

3. This affidavit is submitted in support of an application for a criminal complaint and arrest warrant for Robert David Griffith for violations of 18 U.S.C. § 2422(b) (attempted coercion and enticement of a minor) and 18 U.S.C. § 2252A(a)(5)(B) (possession of child pornography).

4. The statements contained in this affidavit are based in part on information provided by U.S. law enforcement officers, written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents, information gathered from investigative sources of information, and my experience, training, and background as a Special Agent.

5. This affidavit is submitted for the limited purpose of securing a complaint and an arrest warrant. I have not included every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish probable cause that Griffith has violated 18 U.S.C. 18 U.S.C. § 2422(b) and 18 U.S.C. § 2252A(a)(5)(B).

PROBABLE CAUSE

6. On August 14, 2024, an Online Covert Employee (OCE-1) began interacting with another user on the chat application, Kik. The individual, later identified as Griffith, utilized username miguy12341. Kik is a chat application which

allows users to communicate via text message, send images and videos, and connect via various shared interests.

7. Over the course of their communication on Kik, Griffith told OCE-1 he was a 61-year-old man named “Robert” from Michigan. Griffith used a picture of himself as his profile image in the Kik application. He indicated that he was looking for someone who likes an “open family lifestyle,” and that he would love being watched while engaging in sexual activity with OCE-1’s minor daughter. Griffith expressed interest in a sexual encounter with OCE-1’s purported 13-year-old daughter, stating “I will want a threesum with the 2 of you and you 2 can take turns using a strap on on each other but not right away.” Griffith stated to OCE-1 that he had previously had a sexual encounter with a 6-year-old child.

8. On August 16, 2024, Griffith told OCE-1, “I have been thinking and I would like to meet you 2 and see how we are together.” He suggested a meeting in late August, and asked OCE-1 if OCE-1 had told her daughter about Griffith. Griffith also stated regarding OCE-1’s daughter, “I can’t want to have a taste / And I’m really excited to meet the 2 of you / What do you think of my idea of our threesum”; and “I really want [OCE-1’s daughter’s name] and you / With her.” Griffith then described in detail the sexual acts he wanted to engage in with OCE-1’s daughter, including undressing her, kissing, oral sex, and digital penetration. Griffith also asked, “Tell me something / What does she really like / That way I can bring her a

gift.” Griffith asked about sleeping arrangements for his visit and asked what OCE-1’s daughter thought of those arrangements.

9. During the conversation, Griffith also provided a cellphone number ending in 2776 to OCE-1 so that they could continue to communicate via traditional text message. Griffith and OCE-1 agreed on plans for Griffith to travel to Connecticut to meet OCE-1 and her daughter, however the meeting did not occur.

10. On August 21, 2024, Griffith messaged another FBI OCE, OCE-2, on the chat platform Kik, utilizing username miguy12341. Griffith used a picture of himself as his profile image in the Kik application. Over the course of their communication on Kik, Griffith told OCE-2 that he was a 61-year-old man from Michigan and that he had a sexual preference for children that were approximately the age of OCE-2’s purported 8-year-old child. Griffith asked OCE-2 if OCE-2 had “taken you dau[ghter’s] butt yet,” and whether OCE-2 had “had a threesum with you and her yet.” Griffith then stated, “I would love to join you 2 for your first threesum.” Griffith assured OCE-2 that this was “No fantasy here I have real life experience,” and he indicated to OCE-2 that he had previously engaged in sexual activity with a 15-year-old child.

11. Griffith also asked about the child’s sexual experience and preferences. For instance, he stated, “What does she like the most”; “Does she like having her sweet young smooth pussy licked and sucked on”; “I want her to enjoy it”; “Does

she like sucking cock”; and “Can she take all of your cock when she sucks it.” He also offered to bring the child a gift, asking, “What does she like so I can bring her a present.” Griffith also asked if OCE-2 liked to “Take pictures and videos of her with someone else.” When asked if Griffith wanted to record them, Griffith stated, “As long as faces are not shown,” and he agreed to get a mask. Griffith attempted to set up a time and place to meet OCE-2 and OCE-2’s child, and he also stated, “hopefully this will become a regular thing.” The meeting ultimately did not occur.

12. The chat conversation also showed Griffith distributing an image to OCE-2, which Griffith claimed to be child pornography. The image depicts the vagina and pubic region of a pubescent female of unknown age. When confronted about the age of the female shown in the image, Griffith stated that “she is under legal consent.” If Griffith is being truthful about the age of the girl in the image, the image would meet the federal definition of child pornography.

13. In response to an administrative subpoena, T-Mobile provided subscriber information for the phone number, ending in 2776, which was provided by Griffith to OCE-1. The information from T-Mobile listed the subscriber as Robert Griffith of Detroit, Michigan.

14. A query of Robert Griffith in the Michigan Secretary of State database revealed a Michigan driver’s license image of the person who appeared to be depicted on the profile picture in the miguy12341 Kik profile as well as the selfie

images sent by Griffith to OCE-1. The database revealed a date of birth in 1962 and an address in Detroit, MI.

15. In October 2024, law enforcement obtained a search warrant in the Eastern District of Michigan for location information for the phone number attributed to Griffith. The information received from Griffith's phone carrier showed the phone's user to likely be residing on a lot in Detroit, Michigan. This lot was the same location that Griffith provided to the Michigan Secretary of State as his mailing address.

16. On November 6, 2024, law enforcement executed search warrants at the lot for Griffith's person, vehicle, and recreational vehicle. During the execution of these search warrants, items of evidence were seized, including Griffith's cellular phone, which he had on his person.

17. After being advised of his *Miranda* rights, Griffith provided investigators his phone number ending in 2776, which was the phone number that he used to communicate with OCE-1.

18. During a review of the cellular phone seized from Griffith's person, numerous examples of child pornography were observed on the device. Two such examples were as follows:

- a. A 25 second video of an approximately 11-year-old girl being vaginally raped by an adult male.

- b. A 24 second video of an adult male attempting to force his erect penis into the mouth of a nude girl, who is approximately 3 years old, while the girl is crying.

19. The cellular device also contained the application, Kik, and was signed into the miguy12341 account which was in communication with one of the OCEs.

20. Griffith was convicted in 2001 in the U.S. District Court for the Northern District of Illinois for violation of 18 U.S.C. § 2423(b) (travel with intent to engage in sexual acts with a minor). He was sentenced in 2002 to 39 months' imprisonment and three years of supervised release. Griffith's supervised release was revoked in 2005 after he repeatedly left the state without prior authorization and made false statements to Probation in relation to that travel. In 2012, Griffith was convicted in the U.S. District Court for the Eastern District of Michigan for failure to register as a sex offender. He was sentenced in 2013 to 12 months and one day of imprisonment, with five years of supervised release. Griffith again violated his supervised release by absconding and other conduct, and he was sentenced in 2017 to 12 months' imprisonment, followed by six months of supervised release. Griffith subsequently violated his supervised release again and was sentenced in 2018 to six months' imprisonment. Griffith also has a 2019 arrest from Texas for online solicitation of a minor under 14.

CONCLUSION

21. Based on the foregoing, there is probable cause to believe that Robert Griffith violated 18 U.S.C. § 2422(b) (attempted coercion and enticement of a minor) and 18 U.S.C. § 2252A(a)(5)(B) (possession of child pornography).

Respectfully submitted,



Eli Bowers, Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence
and/or by reliable electronic means.



HON. KIMBERLY G. ALTMAN
UNITED STATES MAGISTRATE JUDGE

Date: November 7, 2024